only as a totality, while affording no protection against contingencies affecting merely the *quantum* of the interest. A dower claimant, as a mere volunteer, has of course less equity than a lien-holder, to whom in other respects her position is most comparable.

EVIDENCE—EXPERT WITNESSES—READING OF SCIENTIFIC BOOKS—ULLRICH V. CHICAGO CITY RY. CO., 106 N. E. (ILL.) 828. Where a physician, testifying that hysteria can never result from a physical injury but is congenital, based his opinion on his own observation and experiences, without relying on any text-books or writers on the subject, a cross-examination consisting of references to medical works, so as to convey to the jury the impression that the physician was testifying contrary to medical authority on the subject of hysteria, was improper.

In general a broad range of inquiry is permitted in cross-examining experts. *Trull v. Modern Woodmen,* 12 Ind. 318. Early, however, on the ground of hearsay, it was held improper to allow quotations from medical works as evidence. *Collier v. Simpson,* 5 C. & P. 73. The preponderance of cases hold this view. *Gallagher v. Ry. Co.,* 67 Cal. 16; *Galveston Ry. v. Hanway,* 94 Tex. 76; *Mitchell v. Leech,* 48 S. E. (S. C.) 290; *Hall v. Murdock,* 114 Mich. 233; *Butler v. South Carolina Co., etc.,* 130 N. C. 15. In Wharton on Evidence, sec. 665, the reasons for the rule are stated with approval. The contrary rule has been adopted in Iowa and Alabama. *Bowman v. Woods,* 19 Greene (Iowa) 445; *Stoudenmeier v. Williams,* 29 Ala. 558; *Bales v. State,* 63 Atl. (Ala.) 38. In *Sale v. Eichberg,* 105 Tenn. 333, it was held proper to read from a medical work to test a witness's capacity. In *Clukey v. Seattle Electric Co.,* 27 Wash. 70, the exclusionary rule was narrowed by the holding that when, on cross examination, the question was asked whether medical authorities did not lay down certain rules, the reading of such rules from an author's work was proper. *Conn. Mut. Co. v. Ellis,* 89 Ill. 516, held that paragraphs from books might be read and the witness asked if he agreed. *Hess v. Lowrey,* 122 Ind. 225, and *City of Ripon v. Bittel,* 30 Wis. 614, held that the same may be done to test the learning of the witness. Cf. *Western Assurance Co. v. Mohlman,* 83 Fed. 811. A ruling contrary to that of the principal case was adopted in *State v. Hoyt,* 46 Conn. 330, on the ground that the practice had been permitted by tacit consent for many years. The rule of the principal case is criticized in Wigmore on Evidence, sec. 1690 *et seq.,* and Croswell's Greenleaf on Evidence, 15th ed. sec. 497, note 4. In Rogers on Expert Testimony, sec. 174, however, it is stated that "the rule (of *Ullrich v. Chicago City Ry.*) is supported by the better reason." There is no question that the decision of the principal case accords with the weight of authority, but it would seem, for the reasons pointed out by Wigmore, that the opposite view is sounder on principle, since the objections urged go rather to the weight than the competency of the evidence.

HUSBAND AND WIFE—ADVANCES TO HUSBAND—INTEREST.—RIKER V. RIKER, 92 ATL. (N. J.) 586.—*Held,* a husband is not required to pay inter-